

Exhibit A

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

MICHAEL AVENATTI,)
Plaintiff,)
v.) C.A. No. 1:20-cv-01541-SB
FOX NEWS NETWORK, LLC, a Delaware)
Limited Liability Company; SEAN)
HANNITY; LAURA INGRAHAM; MARIA)
BARTIROMO; HOWARD KURTZ;)
SHANNON BREAM; BRET BAIER; TRISH)
REGAN; RAYMOND ARROYO; JON)
SCOTT; LELAND VITTERT; and)
JONATHAN HUNT,)
Defendants.)

**TRANSMITTAL DECLARATION OF R. GARRETT RICE
IN SUPPORT OF DEFENDANTS' OPENING BRIEF IN SUPPORT OF THEIR
MOTION TO DISMISS THE AMENDED COMPLAINT**

I, R. Garrett Rice, declare:

I am an associate at the law firm Ross Aronstam & Moritz LLP, counsel for Fox News Network, LLC, Sean Hannity, Laura Ingraham, Maria Bartiromo, Howard Kurtz, Shannon Bream, Bret Baier, Trish Regan, Raymond Arroyo, Jon Scott, Leland Vittert, and Jonathan Hunt (collectively, “Defendants”). I submit this declaration in support of Defendants’ Opening Brief in Support of Their Motion to Dismiss the Amended Complaint, filed concurrently herewith.

1. Attached as **Exhibit 1** hereto is a true and correct copy of Tweet from the Los Angeles Police Department (@LAPDHQ), dated Nov. 14, 2018.¹

¹ Non-substantive text and images, including advertisements, have been omitted from the end of certain articles.

2. Attached as **Exhibit 2** hereto is a true and correct copy of L.A. Times article *Police Arrest Porn Star's Lawyer*, dated Nov. 15, 2018.
3. Attached as **Exhibit 3** hereto is a true and correct copy of TMZ article *Michael Avenatti Arrested For Felony Domestic Violence . . . I'll be "Fully Exonerated,"* dated Nov. 15, 2018.
4. Attached as **Exhibit 4** hereto is a true and correct copy of N. Y. Times article, *Michael Avenatti Arrested On Suspicion Of Domestic Violence In Los Angeles*, dated Nov. 14, 2018.
5. Attached as **Exhibit 5** hereto is a true and correct copy of a transcript of CNN's Anderson Cooper 360 Degrees, dated Nov. 14, 2018.
6. Attached as **Exhibit 6** hereto is a true and correct copy of a transcript of MSNBC's The Beat With Ari Melber, dated Nov. 14, 2018.
7. Attached as **Exhibit 7** hereto is a true and correct copy of The Associated Press report, *AP News in Brief*, dated Nov. 14, 2018 11:04 p.m. EST.
8. Attached as **Exhibit 8** hereto is a true and correct copy of a transcript of CBS's This Morning, dated Nov. 15, 2018.
9. Attached as **Exhibit 9** hereto is a true and correct copy of a transcript of NBC News: Today Show, dated Nov. 15, 2018.
10. Attached as **Exhibit 10** hereto is a true and correct copy of The Associated Press article, *The Latest: Avenatti Released After Domestic Violence Charge*, dated Nov. 15, 2018.
11. Attached as **Exhibit 11** here is a true and correct copy of The Associated Press article, *After Arrest, Michael Avenatti Denies LA Domestic Violence*, dated Nov. 15, 2018.

12. Attached as **Exhibit 12** here is a true and correct copy of The Washington Post article, *Michael Avenatti Arrested on Suspicion of Domestic Violence, calls allegations Completely Bogus,* dated Nov. 15, 2018.

13. Attached as **Exhibit 13** here is a true and correct copy of a transcript of CNN: Anderson Cooper 360, dated Nov. 15, 2018.

14. Attached as **Exhibit 14** here is a true and correct copy of a transcript of CNN: Inside Politics, dated Nov. 15, 2018.

15. Attached as **Exhibit 15** here is a true and correct copy of a transcript of CNN: New Day, dated Nov. 15, 2018.

16. Attached as **Exhibit 16** here is a true and correct copy of a transcript of CNN: Early Start, dated Nov. 15, 2018.

17. Attached as **Exhibit 17** here is a true and correct copy of a transcript of CNN: Newsroom, dated Nov. 15, 2018.

18. Attached as **Exhibit 18** here is a true and correct copy of a transcript of CNN: CNN Right Now, dated Nov. 15, 2018.

19. Attached as **Exhibit 19** here is a true and correct copy of a transcript of CNN: Hala Gorani Tonight, dated Nov. 15, 2018.

20. Attached as **Exhibit 20** here is a true and correct copy of a transcript of CNN: Tonight, dated Nov. 15, 2018.

21. Attached as **Exhibit 21** here is a true and correct copy of CNN report, *Michael Avenatti Arrested On Suspicion Of Domestic Violence*, dated Nov. 15, 2018, 7:35 AM.

22. Attached as **Exhibit 22** here is a true and correct copy of CNN report, *Stormy Daniels Says She Will Get A New Lawyer If Domestic Violence Allegations Against Avenatti Are True*, dated Nov. 15, 2018, 5:19 PM.

23. Attached as **Exhibit 23** here is a true and correct copy of a transcript of CNN: Erin Burnett Outfront, dated Nov. 16, 2018.

24. Attached as **Exhibit 24** here is a true and correct copy of a transcript of CNN: Newsroom, dated Nov. 17, 2018.

25. Attached as **Exhibit 25** here is a true and correct copy of The Washington Post article, *Michael Avenatti Law Firm Evicted After Not Paying More Than \$213,000 In Back Rent*, dated Nov. 17, 2018.

26. Attached as **Exhibit 26** here is a true and correct copy of a transcript of NBC Nightly News, dated Nov. 20, 2018.

27. Attached as **Exhibit 27** here is a true and correct copy of a transcript of CBS This Morning, dated Nov. 20, 2018.

28. Attached as **Exhibit 28** here is a true and correct copy of CBS News report, *Judge Grants Mareli Miniutti A Restraining Order Against Michael Avenatti*, dated Nov. 20, 2018, 4:28 PM.

29. Attached as **Exhibit 29** here is a true and correct copy of CNN Wire report, *Aspiring Actress Granted Restraining Order Against Michael Avenatti, Describes Physical And Verbal Abuse*, dated Nov. 21, 2018.

30. Attached as **Exhibit 30** here is a true and correct copy of a transcript of Fox News: America's Newsroom with Bill Hemmer and Sandra Smith, dated Nov. 15, 2018.

31. Attached as **Exhibit 31** here is a true and correct copy of a transcript of Fox News Network LLC: Fox Hannity, dated Nov. 14, 2018. A video clip of this program is also being provided to the Court via thumb drive.

32. Attached as **Exhibit 32** here is a true and correct copy of a transcript of Fox News Network LLC: The Five, dated Nov. 15, 2018. A video clip of this program is also being provided to the Court via thumb drive.

33. Attached as **Exhibit 33** here is a true and correct copy of a transcript of Fox News Network LLC: Ingraham Angle, dated Nov. 15, 2018. A video clip of this program is also being provided to the Court via thumb drive.

34. Attached as **Exhibit 34** here is a true and correct copy of a transcript of Fox News Network LLC: Fox News @ Night, dated Nov. 14, 2018. A video clip of this program is also being provided to the Court via thumb drive.

35. Attached as **Exhibit 35** here is a true and correct copy of a transcript of Fox Business Network LLC: Mornings with Maria, dated Nov. 15, 2018. A video clip of this program is also being provided to the Court via thumb drive.

36. Attached as **Exhibit 36** here is a true and correct copy of a transcript of Fox Business Network LLC: Trish Regan Primetime, dated Nov. 20, 2018. A video clip of this program is also being provided to the Court via thumb drive.

37. Attached as **Exhibit 37** here is a true and correct copy of a transcript of Fox News Network LLC: Ingraham Angle, dated Nov. 14, 2018. A video clip of this program is also being provided to the Court via thumb drive.

38. Attached as **Exhibit 38** here is a true and correct copy of Cleveland.com report, *Voter Registration Ends, Early Voting In Ohio Begins This Week: Capitol Letter*, dated Oct. 8, 2018.

39. Attached as **Exhibit 39** here is a true and correct copy of The Associated Press report, *Michael Avenatti Visits New Hampshire As He Considers 2020 Bid*, dated Aug. 20, 2018.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information and belief.

Executed this 3rd day of March, 2021.

ROSS ARONSTAM & MORITZ LLP


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